

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE

Angela Amerson

Case No. 19-40267

Chapter 13

HON. Shefferly

Debtor(s).

DEBTOR'S CHAPTER 13 CONFIRMATION HEARING CERTIFICATE

[To be completed fully]

At the next confirmation hearing in this case, the debtor intends to: [Check ONE of the following]

1. ☐ Request confirmation of the debtor's plan, because all timely objections of creditors and the trustee have been resolved. I have emailed to the trustee a proposed order confirming the plan, as required in paragraph 2 of the Chapter 13 Case Management Order.

2. ☒ Request confirmation of the debtor's plan, even though all timely objections have not been resolved. I have emailed to the trustee a proposed order confirming the plan, as required in paragraph 2 of the Chapter 13 Case Management Order. The parties are at an impasse in attempting to resolve these objections despite all reasonable efforts. The following are: (a) the parties whose timely objections have not been resolved; (b) their unresolved objections; and (c) the legal and factual issues that must be resolved by the Court in connection with confirmation:

Trustee Objections:

Objections/Issues:

1. Trustee objects stating IRS proof of claim states returns not all filed (amended claim filed)
2. Trustee objects and requests amended Schedule J regarding anticipated rent expense (amended J filed and motion to incur new residential lease filed)
3. Trustee requests 100% of profit sharing/bonuses to be remitted to the Trustee (will provide for 100% dividend to unsecured creditors and hence requests trustee to waive this objection)
4. Trustee requests 100% dividend (will provide for in the order confirming plan)

Creditor # 1: Wells Fargo

Objections/Issues:

1. Creditor objects to its treatment in the plan (amend plan filed)

Creditor # 2: Real Time Resolutions

Objections/Issues:

1. Creditor objects to its treatment in the plan (amend plan filed)

3. Request an adjournment of the confirmation hearing to a.m. due to the following good cause:
4. ☐ Dismiss the case. [The Court will construe this as a motion by the debtor to dismiss the case under Fed.R.Bankr.P. 1017(f)(2), and the Court will enter an order of dismissal and the case will be removed from the docket, unless the case was previously converted from Chapter 7, 11, or 12 to Chapter 13. In that event, a separate motion to dismiss must be filed within 10 days.]
5. ☐ Convert the case to Chapter 7. [The debtor must promptly file a separate notice of conversion under Fed.R.Bankr.P. 1017(f)(3), and pay the filing fee for such notice. Such notice of conversion will cause the case to be converted without the entry of an order of conversion.].

/s/ Erin Bartos Kramer
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